



Momentive Performance Materials Inc.
260 Hudson River Road
Waterford, NY 12188
momentive.com

November 21, 2012

Mr. Steven J. Barlow, P.E.
Division of Air Resources
232 Golf Course Road
Warrensburg, New York 12885

Subject: MPM Silicones, LLC (Momentive) – Request for Extension for Conducting the Confirmatory Performance Test (CfPT) and Continuous Monitoring System (CMS) Performance Evaluation Test at the Rotary Kiln Incinerator

Dear Mr. Barlow:

Thank you for taking the time yesterday to discuss rescheduling of Momentive's upcoming performance testing at the RKI. In accordance with 40 CFR Part 63 1207(i), Momentive is submitting this request for a six month extension to conduct the Confirmatory Performance Test (CfPT) and Continuous Monitoring System (CMS) Performance Evaluation tests at the RKI which are currently scheduled for December 5, 2012.

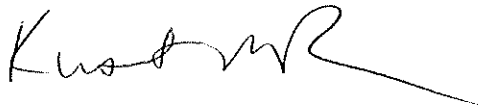
The reasons for requesting this time extension are as follows:

- Temporary Lack of Work/Production Rates - Due to temporary layoffs, the plant will not be operating at typical production rates during the last two weeks of November. This may impact the availability of silane waste feed and also impact system vent flow rates to the RKI.
- RKI Down Time - Recent glycol system repairs resulted in unplanned down time which has impacted Momentive's capability to batch waste feeds (silanes and slurry) for the upcoming CfPT.
- Slurry Feed Analysis - Due to slurry tank T62 line pluggage, Momentive has been delayed in batching up and analyzing the slurry waste feed for the CfPT. The slurry is typically batched and analyzed prior to testing to ensure representative slurry feed is utilized during the CfPT. Although the line has recently been cleared, Momentive has been unable to empty the T62 tank and batch up slurry feed due to RKI down time noted above.
- RKI SCC Pressure - Recent changes to the pressure transmitter have made the RKI more susceptible to AWFCOs caused from momentary pressure spikes due to instrument noise. Momentive is currently investigating the best means to

address this issue; as such Momentive has discontinued feeding drums until this matter is resolved.

Upon Department approval of this request, Momentive will commence performance testing at the RKI on or before June 9, 2013. Please contact me if you have any questions pertaining to this request. I may be reached by email at Kirsten.Pink@momentive.com or by phone at (518) 233-3536.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kirsten Pink', with a long horizontal flourish extending to the right.

Kirsten Pink
Waste Regulatory Leader

cc: J. Coutant – DEC Region 5
D. Gardell, J. Lansing, B. Shaw – DEC Central Office
R. Davis, M. Lunden, G. Grace, R. Yeomans, A. Simmons - Momentive